

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY
R.J. Hughes Justice Complex
P.O. Box 112
25 Market Street
Trenton, New Jersey 08625-0112
Attorney for Defendants State of New Jersey, New Jersey State
Police, Attorney General of the State of New Jersey, Gurbir
Grewal, New Jersey Department of Law and Public Safety, Colonel
Patrick A. Callahan

By: Suzanne Davies
Deputy Attorney General
(609) 633-3985
Suzanne.davies@law.njoag.gov

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
VICINAGE OF TRENTON

FRANKLIN ARMORY, INC,

Plaintiff,

v.

STATE OF NEW JERSEY, et al,

Defendant.

Civil Action No.
19-19323 (FLW/ZNQ)

DECLARATION OF SUZANNE DAVIES

I, SUZANNE DAVIES, of full age, hereby declares:

1. I am licensed to practice law in the State of New Jersey and am admitted to practice before the United States District Court, District of New Jersey. I am employed by the State of New Jersey, Department of Law and Public Safety, as a Deputy Attorney General. I am assigned to the State Police, Employment, and

Corrections Section of the Division of Law, which provides legal representation to the State Police and its employees.

2. On or about October 24, 2020, Plaintiff filed the instant Complaint in the United States District Court, District of New Jersey, Trenton, bearing Civil Action No. 19-19323, captioned, Franklin Armory, Inc. v. State of New Jersey, et al, alleging claims of constitutional violations pursuant to 42 U.S.C. 1983.

3. On December 12, 2019, Service of Process was effected on Defendants.

4. On January 2, 2020, the Court granted Defendants' request for a Clerk's Order Extending Defendants' time to Answer, Reply or otherwise move to January 16, 2020.

5. Due to the press of other matters, I am requesting an extension of twenty-one days from the current deadline to file and serve Defendants' response to the Complaint.

6. Since service of the Complaint, I was assigned to assist and prepare an amicus brief in Gannett Satellite Information Network d/b/a Asbury Park v. Township of Neptune, Docket No. A-4006-18, on behalf of the Office of the Attorney General, that was due on Monday January 13, 2020. This matter is a high profile case requiring significant input and review. This has been very time consuming and has limited my ability to work on other matters.

7. My adversary, Danny Charles Lallis, counsel for Plaintiff, has graciously consented to this request.

I certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

/s/ Suzanne Davies
Suzanne Davies
Deputy Attorney General

DATED: January 16, 2020